

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No:	19-04698
Manuel Lapena)		
)	Chapter:	Chapter 13
Debtor)		
)	Judge:	Timothy A. Barnes

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on June 16, 2022 at 9:30 AM, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the motion of Manuel Lapena to vacate the order for payroll control, a copy of which is attached

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 329 5276 and the passcode is 433658. The meeting ID and passcode can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Dale Allen Riley

Dale Allen Riley
Geraci Law L.L.C.
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CERTIFICATE OF SERVICE

I, Dale Allen Riley, hereby certify that I served a copy of this notice along with the aforementioned document upon the listed parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, from 55 E. Monroe, Suite 3400, Chicago, Illinois, on June 8, 2022 at 12:16 PM.

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EASTERN DIVISION**

In Re:)	Case No:	19-04698
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)	Chapter:	Chapter 13
Debtor)		
)	Judge:	Timothy A. Barnes

LIST OF PARTIES SERVED

Marilyn O. Marshall, 224 S. Michigan Ave. #800 , Chicago, IL 60604

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Manuel Santos Lapena, 8602 N Oleander Ave , Niles, IL 60714

Alden Management Services, 4200 W Peterson Ave, Ste 140, Chicago, IL 60646

IN THE UNITED STATES OF BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No:	19-04698
Manuel Lapena)		
Debtor,)	Chapter:	Chapter 13
)		
)	Judge:	Timothy A. Barnes

MOTION TO VACATE ORDER FOR PAYROLL CONTROL ENTERED ON 2/26/2019

NOW COMES the Debtor, Mr. Manuel Lapena (the "Debtors"), by and through his attorneys, Geraci Law L.L.C., to present his **MOTION TO VACATE ORDER FOR PAYROLL CONTROL ENTERED ON 2/26/2019**, and states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 02/22/2019.
3. The plan was confirmed on 4/11/2019.
4. On 2/26/2019, the payroll control order was entered at the Debtor's consent. See Exhibit A.
5. The Debtor has completed all required plan payments and is awaiting only the Trustee's final audit for the case to close.

WHEREFORE the Debtor, Mr. Manuel Lapena, prays that this Court enter an order vacating the order for payroll control entered on 2/26/2019 and for such further additional relief that this Court may deem just and proper.

____/s/ Dale Allen Riley____
Dale Allen Riley

Attorneys for the Debtor

Geraci Law L.L.C.

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Chicago, Illinois 60603

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